

Hannah Payne Foster (AK Bar #2105045) (admitted *pro hac vice*)  
 Jeremy C. Lieb (AK Bar #1810088) (admitted *pro hac vice*)

**EARTHJUSTICE**  
441 W 5th Avenue, Suite 301  
Anchorage, AK 99501  
T: 907.277.2500  
F: 907.277.1390  
E: [hfooster@earthjustice.org](mailto:hfooster@earthjustice.org)  
[jl Lieb@earthjustice.org](mailto:jl Lieb@earthjustice.org)

Kristen L. Boyles (WSB #23806)  
EARTHJUSTICE  
810 3rd Avenue, Suite 610  
Seattle, WA 98104-1711  
T: 206.343.7340  
F: 206.343.1526  
E: [kboyles@earthjustice.org](mailto:kboyles@earthjustice.org)

*Attorneys for Citizens for Clean Air, a project of  
Alaska Community Action on Toxics, and Sierra Club*

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CITIZENS FOR CLEAN AIR *et al.*,

Plaintiffs,

V.

MICHAEL S. REGAN *et al.*,

Defendants,

and

STATE OF ALASKA.

**Defendant-Intervenor.**

Case No. 2:22-cv-1382-RSL

**JOINT STIPULATED MOTION  
TO EXTEND DEADLINE TO  
FILE MOTION FOR COSTS**

JOINT STIPULATED MOT. TO EXTEND  
(Case No. 2:22-cv-1382-RSL)

*Earthjustice*  
441 W 5th Avenue, Suite 301  
Anchorage, AK 99501  
907.277.2500

1 Plaintiffs and Defendants have reached agreement to resolve Plaintiffs' claims for  
 2 costs and fees of litigation. Because the agreement allows up to 120 days for completion  
 3 of certain required actions, the parties jointly request that the Court extend the deadline  
 4 for Plaintiffs to file a motion for costs of litigation (including reasonable attorneys' fees),  
 5 from March 15, 2024, to July 15, 2024. The parties anticipate that their agreement will be  
 6 fulfilled in advance of that deadline, at which point they will notify the Court that the  
 7 action has been fully resolved.

8 Respectfully submitted this 13th day of March, 2024.

9 *s/ Hannah Payne Foster*

10 

---

Hannah Payne Foster (AK Bar #2105045) (admitted *pro*  
*hac vice*)

11 Jeremy C. Lieb (AK Bar #1810088) (admitted *pro hac*  
*vice*)

12 EARTHJUSTICE

13 441 W 5th Avenue, Suite 301

14 Anchorage, AK 99501

15 T: 907.277.2500

16 F: 907.277.1390

17 E: hfoster@earthjustice.org

18 jlieb@earthjustice.org

19 Kristen L. Boyles (WSB #23806)

20 EARTHJUSTICE

21 810 3rd Avenue, Suite 610

22 Seattle, WA 98104-1711

23 T: 206.343.7340

24 F: 206.343.1526

25 E: kboyles@earthjustice.org

26 *Attorneys for Citizens for Clean Air, a project of Alaska*  
*Community Action on Toxics, and Sierra Club*

1 TODD KIM  
2 Assistant Attorney General  
3 Environment and Natural Resources Division

4 *s/ Daniel J. Martin*

5 DANIEL J. MARTIN  
6 Environmental Defense Section  
7 United States Department of Justice  
8 P.O. Box 7611  
9 Washington, D.C. 20044  
10 T: (202) 307-1056  
11 E: Daniel.Martin3@usdoj.gov

12 *Attorneys for the United States of America*

13 It is so ordered.

14 Dated this 14th day of March, 2024.

15 

16 Robert S. Lasnik  
17 UNITED STATES DISTRICT JUDGE  
18  
19  
20  
21  
22  
23  
24